STIPULATION TO MODIFY CONDITIONS OF RELEASE AND [PROPOSED] ORDER CASE NO. 25-CR-0003-YGR (KAW)

1	Defendant Sheng Thao and the United States, by and through their counsel of record,
2	hereby stipulate as follows:
3	1. Sheng Thao made her initial appearance before the Court on January 17, 2025.
4	The Court entered an order setting an unsecured bond in the amount of \$50,000 and set
5	conditions of release (including, in relevant part, a no-travel restriction outside of the Northern
6	and Eastern Districts of California). See Dkt. No. 14.
7	2. The parties agree on the following conditions-of-release modification: Ms. Thao
8	will be permitted to travel to the Central District of California during the period of January 29,
9	2026, through February 3, 2026, in order for Ms. Thao to visit her sister.
10	3. Pretrial Services Officer Jessica Portillo has no objection to the stipulated
11	location or travel modification of Ms. Thao's conditions of release.
12	IT IS SO STIPULATED.
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14	Dated: January 13, 2026 DLA PIPER LLP (US)
15	By: /s/ Jeffrey E. Tsai
16	JEFFREY E. TSAI
17	Attorneys for Defendant SHENG THAO
18	
19	Dated: January 13, 2026
20	CRAIG H. MISSAKIAN
21	United States Attorney
22	By: /s/ Abraham Fine
23	ABRAHAM FINE MOLLY K. PRIEDEMAN
24	LLOYD FARNHAM
25	Assistant United States Attorneys
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